

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Neuroscience Advanced Systems, Inc., a)	
New York Corporation,)	
)	
Plaintiff,)	
)	
)	Case No. 22-cv-06847
Eugene Lipov and Lipov Medical S.C.)	
d/b/a Stella Center,)	
)	
Defendant.)	

**DEFENDANTS, EUGENE LIPOV AND LIPOV MEDICAL S.C. D/B/A STELLA
CENTER’S, S MOTION TO DISMISS PLAINTIFF’S COMPLAINT**

Defendants Eugene Lipov (“Lipov”) and Lipov Medical S.C. d//b/a Stella Center (“Stella”), (“Wells Fargo”) hereby moves for dismissal with prejudice of Plaintiff, Neuroscience Advanced Systems, Inc., a New York Corporation’s Complaint for failure to state a claim under Fed. R. Civ. P. 12(b)(6). The support for Lipov and Stella’s Motion is set forth in the simultaneously filed Memorandum of Law in Support.

WHEREFORE, and for the reasons set forth in its Memorandum of Law, Eugene Lipov and Lipov Medical S.C. d//b/a Stella Center respectfully request that this Court grant its motion to dismiss this action with prejudice pursuant to Fed. R. Civ. P. 12(b)(6).

Respectfully submitted,
Defendants Eugene Lipov (“Lipov”) and Lipov
Medical S.C. (Stella)
/s/ Paul M. Bach
BACH LAW OFFICES, INC .
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on September 25, 2020, he caused the foregoing to be filed with the Clerk of the Court via the Court's electronic case filing/ECF system, and a copy of the same to be served on counsel of record through the Court's electronic case filing/ECF system.

Respectfully submitted,
Defendants Eugene Lipov ("Lipov") and Lipov
Medical S.C. (Stella)

/s/ Paul M. Bach

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